

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE EQUIFAX, INC. CUSTOMER
DATA SECURITY BREACH
LITIGATION

MDL DOCKET NO. 2800
1:17-md-2800-TWT

DECLARATION OF ROBERT D. GRIEST

I, Robert D. Griest, declare as follows:

1. I am over the age of twenty-one (21), and I am competent in all respects to make this declaration. The facts stated in this declaration are within my personal knowledge and are true.
2. I am an Associate at the law firm of King & Spalding LLP in Atlanta, Georgia. I represent Equifax Inc. (“Equifax”) in the above-captioned MDL proceeding.
3. On July 24, 2020, Equifax sent Jeffrey Hosford of the Hosford Law Firm a letter advising him that cases he filed on behalf of members of the MDL Consumer Settlement Class who did not exclude themselves from the Settlement (“Mississippi Plaintiffs”) violate the anti-suit injunction in this Court’s Final Order and Judgment (Dkt. No. 957, “Final Judgment”). A copy of the letter is attached as Exhibit A.

4. Equifax's counsel also spoke with Mr. Hosford by phone on August 7, 2020, and again advised Mr. Hosford that the Mississippi Plaintiffs were violating the Final Judgment and that Equifax would be forced to file a motion in the MDL Court unless the Mississippi Plaintiffs agreed to dismiss their cases with prejudice.

5. Mr. Hosford has advised Equifax that (i) the Mississippi Plaintiffs disagree that they are barred by the Final Judgment from pursuing their claims against Equifax in Mississippi state court; (ii) the Mississippi Plaintiffs intend to pursue their cases notwithstanding the fact that none of them is included on the list of valid and timely exclusions attached to the Final Judgment; and (iii) Mr. Hosford intends to file cases on behalf of more than 4,500 additional Settlement Class Members who he purports to represent.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This 2nd day of September, 2020.


Robert D. Griest